

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

IN RE: §
ALLAN L. REAGAN, §
Debtor § CASE NO. 20-11161-TMD
§
§ CHAPTER 11

**DEBTOR'S MOTION FOR CONTINUANCE OF CONFIRMATION HEARING AND
RELATED DEADLINES**

TO THE HONORABLE TONY M. DAVIS, UNITED STATES BANKRUPTCY JUDGE:

Allan L. Reagan (the “**Debtor**”) files this Motion for Continuance of Confirmation Hearing and Related Deadlines:

1. On October 22, 2020 (the “**Petition Date**”), the Debtor filed a voluntary petition for relief under chapter 11, title 11 of the United States Code (“**Bankruptcy Code**”).
2. By Order dated January 21, 2021 [Dkt. 59], the Court set a confirmation hearing for the Debtor’s proposed Plan of Reorganization for March 1, 2021. Additionally, the Court set deadlines for ballots and objections for February 22, 2021, and February 25, 2021 for the filing of the ballot summary and a response by the Debtor to any unresolved objections.
3. Debtor had agreed to attend a 2004 examination on February 19, 2021, and to produce documents. Though Debtor had assembled all documents by February 15, 2021, the power outages caused by the conditions in Austin, Texas made it impractical for Debtor’s counsel to process and label the documents for electronic production. Additionally, as of the time of filing of this Motion, Debtor’s counsel is still without power and the road conditions make it impossible to work at the firm’s offices, which are closed at this time.
4. Debtor has agreed to reset the 2004 examination. Additionally, Debtor has proposed a continuance of the confirmation hearing and related deadlines. The Subchapter V

Trustee and counsel for two creditors that Debtor's counsel was able to contact have agreed; Debtor's counsel has not heard from the office of the U.S. Trustee.

5. Debtor proposes the following modified deadlines:

March 22, 2021 at 2:25 p.m.: Confirmation hearing

March 15, 2021 at 5:00 p.m.: Deadline for ballots and objections to plan, and any election under Section 1111(b)

March 18, 2021: deadline for Debtor to file the ballot summary and any response to unresolved objections to confirmation.

WHREFORE, the Debtor requests the Court grant this Motion, and grant the Debtor such other and further relief as is just and proper.

Respectfully submitted,

WALLER LANSDEN DORTCH & DAVIS, LLP

/s/ Mark C. Taylor

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*Attorneys for the Debtor and
Debtor in Possession*

CERTIFICATE OF SERVICE

The foregoing was served on all persons on the attached Service List electronically via the Court's ECF service or via first class mail on this 18th day of February 2021.

/s/ Mark C. Taylor
Mark C. Taylor

SERVICE LIST

Debtor

Allan L. Reagan
585 River Run
Leander, TX 78641

Headley Investments, LP
1500 Knobb Hill Lane
Paoli, PA 19301

Trustee

Michael Colvard
Weston Center
112 East Pecan Street, Suite 1616
San Antonio, TX 78205

Frances and Wayne Lee
468 Jade Tree Lane
Monterey Park, CA 91754

Twenty-largest creditors:

Madison/East Towne LLC
c/o CBL & Associates
2030 Hamilton Place Blvd.
Chattanooga, TN 37421-6000

Capital One Spark Visa for Business
P.O. Box 30285
Salt Lake City, UT 84130-0285

Village @ La Orilla
Attn: Philip Lindborg
12809 Donette Court N.E.
Albuquerque, NM 87112

Chase Ink Card for Business
P.O. Box 15298
Wilmington, DE 19850-5298

Martin S. Headley
1500 Knobb Hill Lane
Paoli, PA 19301

Ford Motor Credit Corp.
P.O. Box 105704
Atlanta, GA 30348

Comerica Bank
Attn: Lesley B. Higginbotham, VP
Special Assets Group - Texas Market
P.O. Box 650282
Dallas, TX 75265-0282

Comerica Bank
Dept. #166901
P.O. Box 55000
Detroit, MI 48255-1669

Ann E. Headley
1500 Knobb Hill Lane
Paoli, PA 19301

Citicard Advantage Mastercard
Cardmember Services
P.O. Box 6062
Sioux Falls, SD 57117

Wyndham Franchisor LLC
22 Sylvan Way
Parssippany, NJ 07054

Discover Card
Billing Inquiries
P.O. Box 30943
Salt Lake City, UT 84130

Spain Family IX LLC
c/o Patrick J. Spain
11809 Oak Branch Dr.
Austin, TX 78737

Chase Visa Mileage Plus
P.O. Box 15298
Wilmington, DE 19850-5298

Bennett Living Trust
Attn: Michael Bennett
2321 Abbot Kinney Blvd.
Venice, CA 90291

Comerica Bank
Attn: J.B. Stueckler, AVP
300 W. Sixth Street
Austin, TX 78701

Gary J. Neumayer
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Bloomington, IL 61704-2449

Unsecured Creditors/ Interested Parties
3401 Hoteliers, LP
Attn: Allan Reagan
2000 S. IH-35, Suite Q11
Round Rock, TX 78681

83rd Street Development, LLC
Attn: Trent G. Moore
9000 Cameron Parkway
Oklahoma City, OK 73114

Action Propane
2601 S. Hwy. 183
Leander, TX 78641

ADT
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Dallas, TX 75266

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Jarrel, TX 76537

AT&T
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Carol Stream, IL 60197

AT&T (DirectTV)
P.O. Box 5014
Carol Stream, IL 60197

Bank of Austin
Attn: David H. Marks, SVP
8611 N. Mopac Exp., Suite 101
Austin, TX 78759

DT Chandler, LLC
Attn: Bret Anderson, Manager
140 E. Rio Salado Parkway, Unit 305
Tempe, AZ 85281

FB Capital, LLC
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Flix Brewhouse AZ, LLC
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Flix Brewhouse Texas IV, LLC
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Hospitality Investors, Inc.
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Internal Revenue Services
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Philadelphia, PA 19101-7346

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Seattle, WA 98103

Lone Star National Bank
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2100 Boca Chica Blvd.
Brownsville, TX 78520

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30 N. LaSalle St., Suite 2120
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Johnson City, TX 78636

Poolwerx by Blue Bottom Pool Supply
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Round Rock, TX 78664

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ROP Arcraft LLC
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El Paso, TX 79912

Round Rock Business Park, LLC
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Round Rock, TX 78681

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U.S. Trustee
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Austin, TX 78701

Wells Fargo Auto
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Georgetown, TX 78626

Parties Filing Claims
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